

THE HONORABLE JOHN H. CHUN

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

FEDERAL TRADE COMMISSION, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC., a corporation,

Defendant.

**CASE NO.: 2:23-cv-01495-JHC**

**STIPULATED MOTION AND  
[PROPOSED] ORDER**

NOTE ON MOTION CALENDAR:  
NOVEMBER 25, 2024

The parties, by and through their attorneys of record, respectfully request that the Court enter the proposed order set forth below. In support of this request, the parties represent the following to the Court:

1. Amazon filed its Answer to Plaintiffs' Second Amended Complaint on November 14, 2024 (Dkt. #341).
2. Pursuant to Federal Rule of Civil Procedure 12(f), Plaintiffs' deadline to file any motion(s) to strike regarding Amazon's Answer to the Second Amended Complaint is December 5, 2024.
3. The parties stipulate as follows, and jointly request that the Court enter the following order approving this stipulation:

- 1 a. Plaintiffs' deadline to file any motion(s) to strike in response to Amazon's  
2 Answer shall be December 9, 2024.
- 3 b. Amazon's deadline to oppose any motion(s) to strike shall be January 10,  
4 2025.
- 5 c. Plaintiffs' deadline to file a reply in support of any motion(s) to strike shall be  
6 January 24, 2025.

7  
8 Stipulated to and respectfully submitted this 25th day of November, 2024, by:

9 s/ Danielle C. Quinn  
10 SUSAN A. MUSSER (DC Bar # 1531486)  
11 EDWARD H. TAKASHIMA (DC Bar # 1001641)  
12 DANIELLE C. QUINN (NY Reg. # 5408943)  
13 CATHLEEN WILLIAMS (MD Bar No Number)  
14 Federal Trade Commission  
15 600 Pennsylvania Avenue, NW  
16 Washington, DC 20580  
17 Tel.: (202) 326-2122 (Musser)  
18 (202) 326-2464 (Takashima)  
19 Email: smusser@ftc.gov  
20 etakashima@ftc.gov  
21 dquinn@ftc.gov  
22 cwilliams@ftc.gov

23 *Attorneys for Plaintiff Federal Trade Commission*  
24

s/ Michael Jo

Michael Jo (admitted *pro hac vice*)  
Assistant Attorney General, Antitrust Bureau  
New York State Office of the Attorney  
General  
28 Liberty Street  
New York, NY 10005  
Telephone: (212) 416-6537  
Email: Michael.Jo@ag.ny.gov  
*Counsel for Plaintiff State of New York*

s/ Rahul A. Darwar

Rahul A. Darwar (admitted *pro hac vice*)  
Assistant Attorney General  
Office of the Attorney General of Connecticut  
165 Capitol Avenue  
Hartford, CT 06016  
Telephone: (860) 808-5030  
Email: Rahul.Darwar@ct.gov  
*Counsel for Plaintiff State of Connecticut*

s/ Alexandra C. Sosnowski

Alexandra C. Sosnowski (admitted *pro hac vice*)  
Assistant Attorney General  
Consumer Protection and Antitrust Bureau  
New Hampshire Department of Justice  
Office of the Attorney General  
One Granite Place South  
Concord, NH 03301  
Telephone: (603) 271-2678  
Email: Alexandra.c.sosnowski@doj.nh.gov  
*Counsel for Plaintiff State of New Hampshire*

s/ Robert J. Carlson

Robert J. Carlson (admitted *pro hac vice*)  
Assistant Attorney General  
Consumer Protection Unit  
Office of the Oklahoma Attorney General  
15 West 6th Street, Suite 1000  
Tulsa, OK 74119  
Telephone: (918) 581-2885  
Email: robert.carlson@oag.ok.gov  
*Counsel for Plaintiff State of Oklahoma*

s/ Timothy D. Smith

Timothy D. Smith, WSBA No. 44583  
Senior Assistant Attorney General  
Antitrust and False Claims Unit  
Oregon Department of Justice  
100 SW Market St  
Portland, OR 97201  
Telephone: (503) 934-4400  
Email: tim.smith@doj.state.or.us  
*Counsel for Plaintiff State of Oregon*

s/ Jennifer A. Thomson

Jennifer A. Thomson (admitted *pro hac vice*)  
Senior Deputy Attorney General  
Pennsylvania Office of Attorney General  
Strawberry Square, 14th Floor  
Harrisburg, PA 17120  
Telephone: (717) 787-4530  
Email: jthomson@attorneygeneral.gov  
*Counsel for Plaintiff Commonwealth of Pennsylvania*

s/ Michael A. Undorf

Michael A. Undorf (admitted *pro hac vice*)  
Deputy Attorney General  
Delaware Department of Justice  
820 N. French St., 5th Floor  
Wilmington, DE 19801  
Telephone: (302) 683-8816  
Email: michael.undorf@delaware.gov  
*Counsel for Plaintiff State of Delaware*

s/ Christina M. Moylan

Christina M. Moylan (admitted *pro hac vice*)  
Assistant Attorney General  
Chief, Consumer Protection Division  
Office of the Maine Attorney General  
6 State House Station  
Augusta, ME 04333-0006  
Telephone: (207) 626-8800  
Email: christina.moylan@maine.gov  
*Counsel for Plaintiff State of Maine*

s/ Schonette Jones Walker

Schonette Jones Walker (admitted *pro hac vice*)

Assistant Attorney General

Antitrust Division

Office of the Attorney General

200 Saint Paul Place

Baltimore, Maryland 21202

Telephone: (410) 576-6473

swalker@oag.state.md.us

*Counsel for Plaintiff State of Maryland*

s/ Katherine W. Krems

Katherine W. Krems (admitted *pro hac vice*)

Assistant Attorney General, Antitrust Division

Office of the Massachusetts Attorney General

One Ashburton Place, 18th Floor

Boston, MA 02108

Telephone: (617) 963-2189

Email: katherine.krems@mass.gov

*Counsel for Plaintiff Commonwealth of Massachusetts*

s/ Scott A. Mertens

Scott A. Mertens (admitted *pro hac vice*)

Assistant Attorney General

Michigan Department of Attorney General

525 West Ottawa Street

Lansing, MI 48933

Telephone: (517) 335-7622

Email: MertensS@michigan.gov

*Counsel for Plaintiff State of Michigan*

s/ Zach Biesanz

Zach Biesanz (admitted *pro hac vice*)

Senior Enforcement Counsel

Office of the Minnesota Attorney General

445 Minnesota Street, Suite 1400

Saint Paul, MN 55101

Telephone: (651) 757-1257

Email: zach.biesanz@ag.state.mn.us

*Counsel for Plaintiff State of Minnesota*

s/ Lucas J. Tucker

Lucas J. Tucker (admitted *pro hac vice*)

Senior Deputy Attorney General

Office of the Nevada Attorney General

100 N. Carson St.

Carson City, NV 89701

Telephone: (775) 684-1100

Email: LTucker@ag.nv.gov

*Counsel for Plaintiff State of Nevada*

s/ Andrew Esoldi

Andrew Esoldi (admitted *pro hac vice*)

Deputy Attorney General

New Jersey Office of the Attorney General

124 Halsey Street, 5th Floor

Newark, NJ 07101

Telephone: (973) 648-7819

Email: andrew.esoldi@law.njoag.gov

*Counsel for Plaintiff State of New Jersey*

s/ Jeffrey Herrera

Jeffrey Herrera (admitted *pro hac vice*)

Assistant Attorney General

New Mexico Office of the Attorney General

408 Galisteo St.

Santa Fe, NM 87501

Telephone: (505) 490-4878

Email: jherrera@nmag.gov

*Counsel for Plaintiff State of New Mexico*

s/ Zulma Carrasquillo Almena

Zulma Carrasquillo Almena (admitted *pro hac vice*)

Puerto Rico Department of Justice

P.O. Box 9020192

San Juan, Puerto Rico 00902-0192

Telephone: (787) 721-2900, Ext. 1211

Email: zcarrasquillo@justicia.pr.gov

*Counsel for Plaintiff Commonwealth of Puerto Rico*

1 s/ Stephen N. Provazza

Stephen N. Provazza (admitted *pro hac vice*)  
2 Special Assistant Attorney General  
Chief, Consumer and Economic Justice Unit  
3 Department of the Attorney General  
150 South Main Street  
4 Providence, RI 02903  
Telephone: (401) 274-4400  
5 Email: sprovazza@riag.ri.gov  
*Counsel for Plaintiff State of Rhode Island*

6 s/ Sarah L.J. Aceves

7 Sarah L.J. Aceves (admitted *pro hac vice*)  
Assistant Attorney General  
8 Public Protection Division  
Vermont Attorney General's Office  
9 109 State Street  
Montpelier, VT 05609  
10 Telephone: (802) 828-3170  
Email: Sarah.Aceves@vermont.gov  
11 *Counsel for Plaintiff State of Vermont*

12 s/ Laura E. McFarlane

Laura E. McFarlane (admitted *pro hac vice*)  
13 Assistant Attorney General  
Wisconsin Department of Justice  
14 Post Office Box 7857  
Madison, WI 53707-7857  
15 Telephone: (608) 266-8911  
Email: mcfarlanele@doj.state.wi.us  
16 *Counsel for Plaintiff State of Wisconsin*

**MORGAN, LEWIS & BOCKIUS LLP**

By: s/ Patty A. Eakes  
Patty A. Eakes, WSBA #18888  
Molly A. Terwilliger, WSBA #28449  
1301 Second Avenue, Suite 2800  
Seattle, WA 98101  
Phone: (206) 274-6400  
Email: patti.eakes@morganlewis.com  
molly.terwilliger@morganlewis.com

**WILLIAMS & CONNOLLY LLP**

Heidi K. Hubbard (*pro hac vice*)  
John E. Schmidlein (*pro hac vice*)  
Kevin M. Hodges (*pro hac vice*)  
Jonathan B. Pitt (*pro hac vice*)  
Carl R. Metz (*pro hac vice*)  
Carol J. Pruski (*pro hac vice*)  
Katherine Trefz (*pro hac vice*)  
680 Maine Avenue SW  
Washington, DC 20024  
Phone: (202) 434-5000  
Email: hhubbard@wc.com  
khodges@wc.com  
jpitt@wc.com  
cmetz@wc.com  
cpruski@wc.com  
ktrefz@wc.com

**COVINGTON & BURLING LLP**

Thomas O. Barnett (*pro hac vice*)  
Katherine Mitchell-Tombras (*pro hac vice*)  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001-4956  
Phone: (202) 662-5407  
Email: tbarnett@cov.com  
kmitchelltombras@cov.com

**WILKINSON STEKLOFF LLP**

Kosta S. Stojilkovic (*pro hac vice*)  
2001 M Street NW, 10th Floor  
Washington, DC 20036  
Phone: (202) 847-4045  
Email: kstojilkovic@wilkinsonstekloff.com

*Attorneys for Defendant Amazon.com, Inc.*

**[PROPOSED] ORDER**

IT IS SO ORDERED.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

\_\_\_\_\_  
JOHN H. CHUN  
UNITED STATES DISTRICT JUDGE

Presented By:

s/ Danielle C. Quinn

SUSAN A. MUSSER (DC Bar # 1531486)  
EDWARD H. TAKASHIMA (DC Bar # 1001641)  
DANIELLE C. QUINN (NY Reg. # 5408943)  
CATHLEEN WILLIAMS (MD Bar No Number)

Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Tel.: (202) 326-2122 (Musser)  
(202) 326-2464 (Takashima)

Email: smusser@ftc.gov  
etakashima@ftc.gov  
dquinn@ftc.gov  
cwilliams@ftc.gov

*Attorneys for Plaintiff*  
*Federal Trade Commission*